



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AFM
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 30, 2019

By Email and ECF

Andrew J. Frisch
One Penn Plaza, Suite 5315
New York, NY 10119

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (ERK)

Dear Mr. Frisch:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, consisting of the following material:

- **ZHU000305-ZHU000306** – Recordings of the defendant's calls from the Metropolitan Detention Center; and
- **ZHU000307-ZHU000309** – Copies of the defendant's emails sent and received using Bureau of Prisons systems at the Metropolitan Detention Center.

The following material produced under cover of this letter is designated **sensitive discovery material** pursuant to the protective order issued by the Court on July 31, 2019.

- **ZHU000311** – Records provided by an advertising platform ("Platform-7") reflecting traffic generated by the defendant.¹

The following material produced under cover of this letter is designated **attorneys' eyes only** pursuant to the protective order issued by the Court on July 31, 2019:

¹ Platform-7 is the same advertising platform that provided the records Bates-numbered ZHU00293 in the government's production of December 11, 2019.

- **ZHU000310** - Records from an advertising platform (“Platform-6”) reflecting traffic generated by the defendant.

The government also requests reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Alexander Mindlin
Alexander Mindlin
Assistant U.S. Attorney
(718) 254-6433

Enclosures

cc: Clerk of the Court (ERK) (by ECF) (without enclosures)